

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR. NO. 20-1370 KWR

JULIAN LUCAS GARCIA, III,

Defendant.

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO THE
UNITED STATES' OPPOSED EIGHTH MOTION IN LIMINE TO EXCLUDE
TESTIMONY BY DEFENDANT'S PROPOSED EXPERT WITNESS, OR IN THE
ALTERNATIVE TO REQUEST DEFENDANT'S PROMPT COMPLIANCE WITH
RULE 16(b)(1)(C)**

Defendant, Julian Lucas Garcia, III, through his counsel of record, Robert J. Gorence of the Gorence Law Firm, LLC, hereby respectfully requests that the Court extend the deadline for his response to the United States' Opposed Eighth Motion in Limine until August 24, 2021. As grounds, undersigned counsel states as follows:

1. Undersigned counsel met with his client on August 14, 2021, at the scene of the accident. Undersigned counsel interviewed numerous witnesses with information pertinent to the accident on that date as well. With that information, undersigned counsel now has to contact the expert retained by prior counsel and to have Mr. Torres revise his expert testimony consistent with Fed. R. Crim. P. 16(b)(1)(C). Undersigned counsel needs, by virtue of his out-of-state travel to attend his son's wedding, an extension until August 24, 2021.

2. Undersigned counsel contacted AUSA Alexander Flores and he opposes this Motion.

FOR THE FOREGOING REASONS, Defendant Julian Garcia respectfully requests that this Court extend the deadline for his response to the United States' Opposed Eighth Motion in Limine until August 24, 2021.

Respectfully submitted,

/s/ Robert J. Gorence
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Attorneys for Defendant Julian Garcia

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of August, 2021, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Alexander Flores, Attorney for United States
(alexander.flores@usdoj.gov)

/s/ Robert J. Gorence
Robert J. Gorence